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March 16, 2021

The Honorable Jocelyn G. Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Public Service Commission Review of South Carolina Code of Regulations
Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J).

Dear Ms. Boyd:

The SouthWest Water Company utilities (SouthWest Utilities) write in response to the comments filed by the Consumer Advocate on March 9, 2021. We reiterate that if the Commission revises the minimum filing requirements for water and wastewater applications, it should do so separately from the energy and telecom proceeding and consider different requirements for Class A, B, and C utilities.

The SouthWest Utilities believe the changes in bill forms recommended by the Consumer Advocate are unreasonably prescriptive. Utilities use different software packages for billing, which may not accommodate the Consumer Advocate's recommendations regarding size, emphasis, and capitalization.

The Commission requires a utility to file "[a] copy of each type of customer bill form, which shall include the information normally shown on a customer's bill for service" when applying for a Certificate of Public Convenience and Necessity. S.C. Code Reg. 103-504; 103-704. A utility must also notify ORS of changes in its bill form. S.C. Code Reg. 103-512.2.3; 103-712.2.3. These regulations give ample opportunity to address any issues with a bill format on a case-by-case basis.

The SouthWest Utilities are currently unaware of any past or current customer complaints about their bill formats.

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Thank you for the opportunity to comment on the Commission's regulations.

With best wishes, I am,

Sincerely yours,

s/ Charlie Terreni

Charles L.A. Terreni

c: Counsel of record